

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF WEST VIRGINIA

FILED

MAY 18 2021

U.S. DISTRICT COURT-WVND  
MARTINSBURG, WV 25401

UNITED STATES OF AMERICA,

v.

CHARLES E. MCGHEE, JR.,

Defendant.

Criminal No.

1:21-CR-

34

Kleeh

Violations:

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(C)

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

**(Possession with Intent to Distribute Methamphetamine)**

On or about January 29, 2020, in Harrison County, in the Northern District of West Virginia, defendant **CHARLES E. MCGHEE, JR.** did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**FORFEITURE ALLEGATION**

*Controlled Substance Act*

1. Pursuant to Title 21, United States Code, Section 853 and Title 21, United States Code, Section 841(a)(1), the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property used, or intended to be used, to commit or to facilitate the commission of the above referenced offense, and any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offense, including, but not limited to \$2,154.00 seized on January 29, 2020.

2. Pursuant to Title 28, United States Code, Section 2461(c), the government will seek forfeiture of substitute property up to the value of property subject to direct forfeiture that is not available for forfeiture on account of any act or omission contemplated by Title 21, United States Code, Section 853(p)(1).

A true bill,

/s/ \_\_\_\_\_  
Foreperson

/s/ \_\_\_\_\_  
RANDOLPH J. BERNARD  
Acting United States Attorney

Brandon S. Flower  
Assistant United States Attorney